

1 ALLEN LICHTENSTEIN (SBN 3992)  
Attorney at Law  
2 3315 Russell Road, #222  
Las Vegas, NV 89120  
3 Telephone: (702) 433-2666  
4 Facsimile: (702) 433-9591  
allaw@lvcoxmail.com

5 JOHN HOUSTON SCOTT (SBN 72578)  
(admitted pro hac vice)  
6 **SCOTT LAW FIRM**  
7 1388 Sutter Street, Suite 715  
San Francisco, California 94109  
8 Telephone: (415) 561-9600  
Facsimile: (415) 561-9609  
9 [john@scottlawfirm.net](mailto:john@scottlawfirm.net)

10 Attorneys for Plaintiff

11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**  
13  
14

15 NIKTA JANATI,

16 Plaintiff,

17 v.

18 UNIVERSITY OF NEVADA  
LAS VEGAS SCHOOL OF DENTAL  
19 MEDICINE, R. MICHAEL SANDERS,  
STANLEY NELSON, CHRISTOPHER  
20 KYPUROS, KAREN WEST,  
BRANDON BIEHLER, ELENI COLLIS,  
21 and DOES 1-20,

22 Defendants.  
23

Case No: 2:15-cv-1367-APG-CWH

**STIPULATION FOR PLAINTIFF TO  
ABANDON GENERAL DAMAGES  
CLAIMS**

**ORDER**

24 It is hereby stipulated by and between the Parties, by and through their respective counsel,  
25 as follows:  
26

- 27 1. Plaintiff is abandoning all claims found in her First Amended Complaint (ECF. No. 29) for  
28 general damages, including, but not limited to, any and all medical and emotional distress

1 claims;

2 2. Paragraphs 73, 78, and Plaintiff's second prayer for relief in the First Amended Complaint  
3 (ECF. No. 29) shall be stricken in their entirety;  
4

5 3. Plaintiff's reference to being "upset" in Paragraph 21 of her First Amended Complaint (ECF.  
6 No. 29) shall be stricken;

7 4. Plaintiff and her counsel agree not to mention, refer to, or attempt to convey to the jury in any  
8 manner, either directly or indirectly, that Plaintiff has suffered any hurt, upset, emotional  
9 distress or medical symptoms/treatment in connection with the allegations found in the First  
10 Amended Complaint (ECF. No. 29);  
11

12 5. Plaintiff stipulates and agrees that the jury will be instructed that it may not award general  
13 damages or damages of any kind for any pain, suffering, hurt, embarrassment, or emotional  
14 distress and that Plaintiff's damages are limited to non-medical compensatory and economic  
15 damage, only;  
16


17 6. Nothing in this stipulation will preclude the Defendants from taking discovery on her prior  
18 allegations of medical/emotional distress as Plaintiff's prior allegations may relate to the  
19 Defendant's defenses at trial nor waive or preclude the right of Plaintiff to object to such;  
20 and  
21

22 7. The Parties agree to address the admissibility at trial of any evidence gathered on these  
23 medical/emotional issues during discovery through motions in limine.  
24

25 Dated this 13<sup>th</sup> day of September, 2016.

26 Respectfully submitted by:

27 **IT IS SO ORDERED.**  
28

  
UNITED STATES DISTRICT JUDGE  
Dated: September 13, 2016.

1 s/ Allen Lichtenstein  
2 Allen Lichtenstein,  
3 Nevada Bar No. 3992  
4 3315 Russell Road, No. 222  
5 Las Vegas, NV 89120  
6 (702) 433-2666 - phone  
7 (702) 433-9591 - fax  
8 allaw@lvcoxmail.com

s/Debra L. Pieruschka  
Debra L. Pieruschka  
Asst. General Counsel  
UNLV4505 S. Maryland Parkway, Box 451085  
Las Vegas, NV 89154  
(702) 895-5185 phone  
(702) 895-5299 fax

9 JOHN HOUSTON SCOTT (SBN 72578)  
10 (admitted pro hac vice)  
11 **SCOTT LAW FIRM**  
12 1388 Sutter Street, Suite 715  
13 San Francisco, California 94109  
14 Telephone: (415) 561-9600  
15 Facsimile: (415) 561-9609  
16 john@scottlawfirm.net

Lyssa A. Anderson  
Kaempfer Crowell  
1980 Festival Plaza Drive, Ste. 650  
Las Vegas, NV 89135  
(702) 792-7000 phone  
(702) 796-7181 fax  
landerson@kcnvlaw.com

Attorneys for Defendants

Attorneys for Plaintiff

**ORDER**

IT IS SO ORDERED.

United States District Court Judge

Submitted by:

23 /s/ Allen Lichtenstein  
24 ALLEN LICHTENSTEIN (SBN 3992)  
25 Attorney at Law  
26 3315 Russell Road, #222  
27 Las Vegas, NV 89120  
28 Telephone: (702) 433-2666  
Facsimile: (702) 433-9591  
allaw@lvcoxmail.com